

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Westside Lead - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #9
Progress
Westside Lead
C482
ATLANTA, GA
Latitude: 33.7654320 Longitude: -84.4087470

To: James Webster, USEPA R4 ERRPB

From: Chuck Berry, OSC

Date: 6/16/2020

Reporting Period: June 1 - June 14

1. Introduction

1.1 Background

Site Number:	C482	Contract Number:	
D.O. Number:	68HE0420F0006	Action Memo Date:	5/6/2020
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/6/2020	Start Date:	1/6/2020
Demob Date:		Completion Date:	
CERCLIS ID:	GAN000407160	RCRIS ID:	
ERNS No.:		State Notification:	GA EPD
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Other - Historical use of contaminated fill prior to implementation of the Resource Conservation and Recovery Act (RCRA).

1.1.2 Site Description

1.1.2.1 Location

The Westside Lead Site is located in the English Avenue and Vine City neighborhoods of Atlanta, just west of downtown. The site is bounded by the former CSX rail line and Northside Drive to the east, North Avenue to the north, Oliver Street and Sciple Terrace to the west, and Foundry Street to the south. The address used is 395 Elm Street, Atlanta, Fulton County, Georgia 30314. The Site coordinates are Latitude: 33.7654320, Longitude: -84.4087470.

The Site is primarily residential with commercial and institutional property interspersed throughout, but particularly along the eastern border abutting the former rail line. Additionally, several large City parks are included in the boundary. Based on a parcel-by-parcel survey, there are 1085 residential properties within the entirety of the boundary. Most are single-family homes, although there are several multi-family properties within the area. Nearly all of the owners are absentee landlords renting out the property. Based on a lot-by-lot survey, EPA determined 35% of the property in the site is unimproved empty lots. Of the remaining 65% with structures on the property, 32% of those are abandoned or otherwise unoccupied, or about 21% of the properties as a whole. Based on this survey 56% of the properties have no residents living there.

1.1.2.2 Description of Threat

Refer to Initial POLREP for this information.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Refer to Initial POLREP for this information.

2. Current Activities

2.1 Operations Section

2.1.1 Previous Response Actions

Residential soil excavation began on January 27, 2020. For a detailed accounting of previous activity during this response, please see the prior Pollution Reports.

2.1.2 Response Actions This Reporting Period

Removal crews continued to excavate and backfill lead-contaminated soils from residential yards. Work was initiated on a large group of contiguous parcels on Vine and Elm Streets. These properties range in risk tiers from a Tier 2 to a Tier 5. There is a common drainage path for all 7 of these properties, with 2 large lots

on Vine Street contributing almost a half-acre of areal drainage. Prior to the removal action, the lots were heavily overgrown, and the vegetation provided some storage of rainwater before releasing it onto the Elm Street lots below. However, the removal action required removal of the trees, and the area now immediately sheds approximately 14,000 gallons of water for every inch of rainfall, which can occur quite rapidly during summer thunderstorms. Because of the need to manage this runoff in its entirety, the OSC initiated removal actions across all the lots at the same time, regardless of the risk tiers. EPA met with representatives of the City Department of Watershed Management's Stormwater Management Division to discuss the City's preferred methods of handling the water. The City stated an infiltration trench with enough capacity to handle a 1-inch event would be sufficient to satisfy the City's requirements under the Green Infrastructure Initiative. A representative of the owner of 370 Vine Street, where the control device will be constructed, stated they agreed with the plan.

The Remedial and Site Assessment Branch initiated a Preliminary Assessment to explore listing the site on the National Priorities List. Beginning on June 1, 2020, the initial property sampling and assessment transitioned to this project. High priority properties identified during this sampling initiative will be referred to the Removal Action for accelerated cleanup. Additionally, most of the outreach designed to introduce residents to the site and obtain access agreements is now managed by RSES. ERRPPB will contribute and participate as requested.

Atlanta Gas Light is disconnecting unused service lines in the West Atlanta neighborhoods, and approximately 40 locations are within the Westside Lead site boundary. The OSC and EPA attorney's reviewed the workplan and agreed it provided reasonable controls to prevent unwanted migration of contaminants during AGL's activities. EPA will assist with disposing of any slag-impacted material AGL may uncover during their activities.

EPA is also in consult with the City of Atlanta Department of Watershed Management for access to water service at the new START and EPA office trailers. Under an agreement with DWM, ERRS will submit a modified permit request to DWM for approval and processing. However, the OSC requested ERRS continue to mobilize the trailers without a permit in hand [under the 40CFR300.400(e) exemption], as the time frame for permit approval and meter installation may be extensive. ERRS has made plans for temporary water service using tanks and pumps without a City meter hookup. The permit should be applied for during the next reporting period.

START collected additional characterization samples from a lot where a home is currently under construction. The property owner plans to re-grade sections of the property prior to putting the home into service. In order to evaluate the property as it will be after the construction is complete, START collected samples at uniform horizons at depth in those areas planned to be re-graded. No horizons were found to have lead concentrations greater than the site-specific remediation goal of 400 ppm, meaning no additional excavation is needed.

2.1.2 Outreach and Community Involvement

RSES assumed control of the overall site outreach program on June 1. ERRPPB will continue to support outreach efforts as requested.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement activities continue. If a PRP is identified, appropriate action will be taken.

2.1.4 Progress Metrics

Metrics are current as of the end of the reporting period. Sampling metrics are still reported even though RSES is now managing the effort, as this provides some insight into future site activities under this Action Memorandum.

SAMPLING	
Total Properties (estimated):	1068
Access Granted:	392
Properties Sampled:	298
Properties Requiring Removal (>400 ppm):	145
TIERS	
Tier 1 - Children present and soil Pb > 1,200 ppm	1
Tier 2 - Children present and soil Pb >400 and <1200 ppm	11
Tier 3 - Adults only and soil Pb >1,200 ppm	5
Tier 4 - Adults only and soil Pb >400 <1,200 ppm	36
Tier 5 - Unimproved or abandoned property with soil Pb >400	92
REMOVALS	
Properties Requiring Removal:	145

Properties in Progress:	9
Properties Completed:	22
Properties Remaining:	123
DISPOSAL	
Tons of non-hazardous soil:	7,034

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

During the weeks of June 15-28, ERRS will continue to address the large number of adjacent properties along Elm and Vine Streets.

2.2.1.2 Next Steps

The Region 4 Superfund Remedial and Site Evaluation Branch has initiated a Preliminary Assessment for the Westside Lead Site. All sampling and outreach efforts to support sampling will be transferred to RSEB on June 1, 2020.

2.2.2 Issues

Worker health and safety due to the coronavirus outbreak is of utmost concern. Workers are implementing and continually evaluating the SEMD COVID-19 protocols.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

An Action Memorandum funding increase was signed on May 6, 2020, bringing the total site allocation, including contingency funds, to \$5,940,000. The Action Memorandum also exempted the site from the 12-month and \$2,000,000 statutory limits.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$4,100,000.00	\$2,100,000.00	\$2,000,000.00	48.78%
TAT/START	\$1,300,000.00	\$138,000.00	\$1,162,000.00	89.38%
Intramural Costs				
Total Site Costs	\$5,400,000.00	\$2,238,000.00	\$3,162,000.00	58.56%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

STAFFING THIS REPORTING PERIOD

OSCs: 1

CICs: 1

START: 1

ERRS: 14

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.